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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

MOTORS LIQUIDATION COMPANY, *et al.*,  
f/k/a General Motors Corp., *et al.*,

Debtor.

Chapter 11

Case No. 09-50026 (REG)

Jointly Administered

**NOTICE OF APPEARANCE  
AND REQUEST FOR SERVICE OF PAPERS**

**PLEASE TAKE NOTICE** that the undersigned hereby appears in this case as attorneys for Appaloosa Management L.P. (“Appaloosa”) with respect to its managed-fund entities’ claims based upon beneficial ownership of the £350,000,000 8.375% Guaranteed Notes due December 7, 2015 and the £250,000,000 8.875% Guaranteed Notes due July 10, 2023 issued by General Motors Nova Scotia Finance Company, which Notes are fully and unconditionally guaranteed by Motors Liquidation Company f/k/a General Motors Corporation, and requests as provided in 11 U.S.C. § 1109(b) and Federal Rules of Bankruptcy Procedure 2002, 9007, and 9010(b) (the “Bankruptcy Rules”) that all notices given or required to be given, and all papers served or required to be served, be given to and served upon:

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**PLEASE TAKE FURTHER NOTICE** that pursuant to 11 U.S.C. § 1109(b), this request includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint or demand, whether formal or informal, whether written or oral, whether transmitted or conveyed by mail, courier service, hand-delivery, telephone, facsimile transmission, telegraph, telex, email, Internet, or otherwise filed or made with regard to the above-captioned case, or that affects or seeks to affect in any way any rights or interests of any party in interest in this case.

**PLEASE TAKE FURTHER NOTICE** that demand is also made that the undersigned be added to the notice list for notice of all contested matters, adversary proceedings, and other proceedings in the referenced chapter 11 cases.

**PLEASE TAKE FURTHER NOTICE** that neither this Notice of Appearance nor any subsequent appearance, pleading, claim, or suit is intended or shall be deemed to be a waiver of any of the following by or on behalf of Appaloosa or any of its managed fund entities: (i) right to have final orders in non-core matters entered only after de novo review by a district judge; (ii) right to trial by jury in any proceeding so triable herein or

in any case, controversy or proceeding related hereto; (iii) right to have the reference withdrawn by the United States District Court in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claims, actions, defenses, setoffs or recoupments to which it is or may be entitled under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments expressly are reserved.

Dated: New York, New York  
December 3, 2009

GREENBERG TRAURIG, LLP

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**CERTIFICATE OF SERVICE**

The undersigned, an attorney admitted to practice before this Court, hereby certifies that a true and correct copy of the pre-fixed *Notice of Appearance and Request for Service of Papers* was served on December 3, 2009, by regular mail upon the parties listed on the attached Exhibit A, and by electronic mail upon the parties listed on the attached Exhibit B.

Dated: New York, New York  
December 3, 2009

/s/ Michele Angell

Michele Angell

**EXHIBIT A**

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**Exhibit B**

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